

ORIGINAL

United States District Court
District of Delaware

JAMES HALL, plaintiff

C.A. # NO: 04-1328-GMS

v.

DAVID HOLMAN

ET AL;

Amended Complaint / Correction of Deficiencies

Motion to Amend pursuant to F.R.C.P. R. 15A

Petitioner hereby moves the Honorable Court to allow the following information
to be amended into the §1985 Action pending before the Court



1) Plaintiff is a pro se litigant and seeks pleading leniency under Haines v. Kerner, 404 U.S. 519, 92 S.Ct. 594 (1972) of which the court should allow liberal amendment of civil action complaints (see also Wilson v. Rahnke, 878 F.2d 772 (3d Cir 1989).

2) Plaintiff humbly wishes to correct minor deficiencies in his pro se filed civil complaint, and offers the following in support.

1. NO harm to state, because they have yet to file an answer.

2. Plaintiff is pro se - unlettered in the law. However comes to this court as a friend of the court in good faith with a meritorious claim. And if pleading leniency is not granted, injustice will occur.

3. Correcting pleading deficiencies at this early stage will assist both judicial economy and resources.

4) Specifically Plaintiff... wishes to make the following changes of corrections with regards to Item # III, Title Heading (parties).

That read as follows: Name of Plaintiff JAMES HALL

A. Address DCC 1181 Paddock RD, Smyrna DE 19977

B. Defendant _____ is employed as Security Superintendent
at Delaware Correctional Center, near Smyrna DE

C. ~~Additional~~ Defendants Lawrence McGowan, Deputy Warden
Clyde D. Sagers, Acting Deputy Warden I.
Delaware Department of Corrections

Respectfully The plaintiff wishes to make The Following Changes (Deficiencies)

B. To Read As Follows: Defendant David Holman is employed AS Security
Superintendent At Delaware Correctional Center near Smyrna Del

C. Additional Defendants Lawrence McQuagran Deputy Warden
Clyde D. Sagers. Acting Deputy Warden 1.

5 Plaintiff Brings this §1983 Action Against Defendants in their individual
And official capacity.

Conclusion

Wherefore The Plaintiff pray this Honorable Court Allow the following deficiencies
corrections To be amended in the §1983 Action pending before the Court

Respectfully Submitted this 6 day of Sept, 05

James Hall
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IM James Hall

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